

UNITED STATES DISTRICT COURT
for the
DISTRICT OF MASSACHUSETTS

FOUR WOMEN HEALTH SERVICES, LLC,
Plaintiff

vs.

ABUNDANT HOPE PREGNANCY
RESOURCE CENTER INC., d/b/a
ATTLEBORO WOMEN'S HEALTH
CENTER, CATHERINE ROMAN, NICOLE
CARGES, and DARLENE HOWARD,
Defendants

CIVIL ACTION No: 1:24-CV-12283-JEK

**DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION FOR
LIMITED EXPEDITED DISCOVERY**

The Defendants hereby oppose the Plaintiff's Motion for Limited Expedited Discovery. As grounds therefor, the Defendants assign as follows:

1. In its memorandum in support of its motion, the Plaintiff has not presented any persuasive arguments as to why this case's discovery should be treated differently from the typical civil action brought before this Court.
2. That memorandum contains numerous admissions by the Plaintiff that it has no real evidence to support its allegations that the Defendants engaged in illegal wire-tapping and computer fraud.
3. The Plaintiff does not have a likelihood of success on its claim and therefore its motion for a preliminary injunction should be denied, thus nullifying its claimed justification for expedited discovery.

4. Despite the Plaintiff's claims, the Plaintiff's Requests for the Production of Documents and Interrogatories are not narrowly focused, are burdensome, and are not targeted simply to support the scope of a preliminary injunction.

5. The Defendants' arguments in opposition to Plaintiff's Motion for Limited Expedited Discovery are fully contained in the attached Memorandum in Support of Defendants' Opposition to Plaintiff's Motion for Limited Discovery.

The Defendants, Abundant Hope Pregnancy Resource Center, d/b/a Attleboro Women's Health Center, Catherine Roman, Nicole Carges, and Darlene Howard,
By Their Attorney,

/s/ Thomas M. Harvey
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Dated: 9-23-2024

CERTIFICATE OF SERVICE

I, Thomas M. Harvey, attorney for the Defendants, hereby certify that on September 23, 2024, I forwarded a copy of the following document:

**DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION FOR
LIMITED EXPEDITED DISCOVERY**

to the Plaintiff by E-mailing a copy of the same, to the following:

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